

## George Edwards

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**From:** Callan, Jennifer (CAO) <Jennifer.Callan@cao.hctx.net>  
**Sent:** Wednesday, March 2, 2022 4:00 PM  
**To:** Eman Patricia Katbi; tony@mallaw.com; jason@sheenalawfirm.com; George Edwards; Christine Herron; ELFParegal  
**Cc:** Butt, James (CAO); Bradley, Suzanne (CAO); Ayala, Miryea (CAO); David Adler; Richard Kuniansky  
**Subject:** RE: [External] Anderson, 4:21cv3730



Thank you for your proposal. However, Defendants Harris County, Estrada, Page, Alobaidi and Garcia-Fernandez decline your offer.

Best regards,

**Jennifer F. Callan**

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**From:** Eman Patricia Katbi <eman@eslawpartners.com>  
**Sent:** Tuesday, March 1, 2022 4:50 PM  
**To:** Bradley, Suzanne (CAO) <Suzanne.Bradley@cao.hctx.net>; Richard Kuniansky <rkuniansky@gmail.com>; tony@mallaw.com; Callan, Jennifer (CAO) <Jennifer.Callan@cao.hctx.net>; Butt, James (CAO) <James.Butt@cao.hctx.net>; David Adler <davidadler1@hotmail.com>; jason@sheenalawfirm.com  
**Cc:** George Edwards <george@eslawpartners.com>; Christine Herron <christine@eslawpartners.com>; ELFParegal <paregal@eslawpartners.com>  
**Subject:** Re: [External] Anderson, 4:21cv3730

Good afternoon counsel,

In the interest of attempting to reach an agreement and in light of the Court's ruling on similar legal issues, Plaintiffs propose that the following conditions be the limitations on discovery:

1. No depositions be taken in this case until the Court issues an order otherwise.
2. No written discovery be served on any indicted defendants until the Court issues an order otherwise.
3. No dispositive motions (including Rule 56 motions) be filed in this case until the Court issues an order otherwise.

Please advise if the parties are agreeable.

Best regards,  
Eman Patricia Katbi  
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